

DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

1. Have any of you ever owned your own business?
 - a. If yes, for how long?
 - b. What type of business?
 - c. How many employees did you have?
2. Have any of you ever been an independent contractor affiliated with a business, rather than an employee? If so, what type(s) of entities did you contract with? Did you believe you were compensated fairly?
3. Have any of you ever worked in sales? In what capacity? Please describe.
4. Have any of you ever had a dispute with an employer, employee, business partner, or anyone else about whose clients or customers were whose? If so, what type of business was it? What was the nature of the dispute? How did it get resolved?
5. Have any of you ever been accused of breaching a contract? If so, what type of contract? How did it work out?
6. Have any of you ever been in a long negotiation period before signing a contract?
7. Have any of you ever been loaned money by an employer? Did you pay it back? Were there any disputes over the amount, or other issues of repayment?
8. Have any of you ever accused your employer or business partner or affiliate of taking more than their fair share of revenue or compensation? How was the situation resolved?
9. Have any of you worked in the financial services, insurance, or securities industries? If so, please tell us what jobs you have had.
10. Do any of you have friends or family who have worked in the financial services, insurance, or securities industries? If so, please tell us what jobs they had and what they have told you about that business.
11. Would you tend to identify with either the employee or the employer in a lawsuit between those parties?
12. Would you have a problem deciding for the company instead of a former employee of that company?
13. Would you have a problem deciding for the company instead of the former employee if you feel the company did something unfair, but nothing illegal?
14. Would you have a problem awarding the plaintiff no money if you determine that he suffered no damages?
15. Do you feel that if a company is sued by an individual it should be required to pay at least some money?

16. Have you or has anyone close to you ever been involved in the demotion, laying off or firing of another employee? Please tell us about that situation.
17. Do you supervise others at your job? If so, in what capacity and how many people?
18. Have you or has anyone close to you ever been treated unfairly by an employer? If so, please explain that experience and what, if anything, you or the person close to you did about it. How do you feel about the outcome of that situation?
19. Do you or have you ever had responsibility for hiring and firing people? Approximately how many individuals have you hired or fired?
20. Have any of you ever been the subject of an internal investigation or disciplinary proceeding at your company?
21. Have any of you ever been part of conducting an internal investigation or disciplinary proceeding at your company? Were you satisfied with the outcome? Why or why not?
22. Is your current job considered management? If yes, what is your title? How many people do you manage or supervise?
23. Have any of you ever had a job which was considered management? If yes, how many people did you manage or supervise?
24. Are any of you or have you ever been a union member? If so, what union were you in and for how long were you in the union?
25. Do any of you invest in the stock market other than 401K plans or other retirement plans? If so, how often?
26. Have any of you ever been fired from a job? What were the circumstances, if so? Did you feel you were treated fairly?
27. Have any of you had any training or taken any courses in the law? If so, please tell us about your training?
28. Have any of you had any training or taken any courses in the financial services, insurance, or securities businesses? If so, please tell us about that.
29. Does anyone here have any family or friends who are attorneys, judges or court personnel? If so, what have they told you about their work?
30. Does anyone here feel strongly that the only way to get corporations to behave ethically is by awarding large damages against them in lawsuits? If so, why?
31. Would anyone here say that from what you know at this time they have strong negative or positive opinions about any of the parties? If so, what are they?
32. In the last two years have any of you experienced a major life change, such as marriage, birth of a child, divorce, death of a loved one, significant work promotion, termination, or the like? If so, please tell us about it
33. Do you attend religious services regularly?

34. Are any of you involved in regular activities at your church, synagogue, mosque or other place of worship?
35. Do you do volunteer work? For what type of organization?
36. Have any of you or your significant other experienced a serious financial setback in the last two years?
37. Does anyone here have any medical, hearing or vision issues that could affect your ability to sit on this jury?
38. Has anyone here ever been involved in a lawsuit as a plaintiff, defendant or witness?
 - a. What kind of case was it?
 - b. Were you satisfied with the process?
39. Has anyone here ever served as a juror before?
 - a. If yes, what type of case?
 - b. Did the jury reach a verdict?
40. Have you ever served as a foreperson?
41. Will any of you have any difficulty following the law as I instruct it even if you disagree with it?
42. Is there any reason why any of you cannot be a fair and impartial juror in this case?